

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)	CHAPTER 7
)	
MICHAEL PELLEGRINO,)	NO. 18-8362
)	
Debtor.)	JUDGE LASHONDA A. HUNT

**MOTION OF JOHN K. KNEAFSEY TO
WITHDRAW AS COUNSEL FOR DEBTOR**

John K. Kneafsey moves the Court, pursuant to Local Rule 2091-A to grant his motion to withdraw as counsel for Michael A. Pellegrino (the "Debtor"). In support of this Motion, John K. Kneafsey respectfully states as follows:

1. On March 16, 2018, John K. Kneafsey was retained by the Debtor, Michael A. Pellegrino, to represent Michael A. Pellegrino to cover normal bankruptcy proceedings. Any adversary proceedings or other litigation in the bankruptcy proceeding would be on a separate agreement entered into by the parties, including hourly rate and costs. Exhibit 1.

2. John K. Kneafsey has met with the Debtor, Michael A. Pellegrino on several occasions, and had a verbal agreement that was to be evidenced by a written agreement for representation to cover non-normal bankruptcy proceedings such as Bankruptcy 2004 meetings and adversary proceedings.

3. Michael A. Pellegrino has not fulfilled the oral agreement to sign the agreement for representation or fulfill its terms.

4. There has been before this Court motions by the U. S. Trustee, and two (2) debtors concerning extensions of time to file adversary complaints and motions concerning 2004 meetings for the Debtor and four (4) other persons.

5. The Debtor, Michael A. Pellegrino, has not agreed to sign an agreement for this firm to represent him in the additional litigation.

WHEREFORE, pursuant to local Rule 2091-A, Nisen & Elliott, LLC and John K. Kneafsey move to withdraw as counsel for Debtor, Michael A. Pellegrino and move for this Court grant leave to withdraw as counsel.

Respectfully submitted,

/s/John K. Kneafsey

John K. Kneafsey

NISEN & ELLIOTT, LLC

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NOTICE OF MOTION

PLEASE TAKE NOTICE that on July 19, 2018 at 10:00 a.m., I shall appear before the Honorable LaShanda A. Hunt, Bankruptcy Judge in Courtroom 719 at the Everett McKinley Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, or any other Bankruptcy judge who may be sitting in her place and shall present a **Motion Pursuant to Local Rule 2091-A to Withdraw as Counsel for Debtor**, a copy of which is attached hereto and is hereby served upon you.

/s/John K. Kneafsey
John K. Kneafsey
NISEN & ELLIOTT, LLC
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Chicago, IL 60606
(312) 346-7800
jkneafsey@nisen.com

CERTIFICATE OF SERVICE

I John K. Kneafsey, an attorney, state that on July 11, 2018, pursuant to Local Rule 9013-1(D) the **Notice of Motion** and **Motion of John Kneafsey to Withdraw as Counsel for Debtor** were filed and served on all parties, either via the Court's Electronic Notice for Registrants or via First Class Mail, as indicated on the service list below.

/s/John K. Kneafsey

SERVICE LIST

Registrants Serviced Through the Court's Electronic Notice:

Richard H. Fimoff rfimoff@rsplaw.com, fb@rsplaw.com

Patrick S. Layng USTPRegion11.ES.Ecf@usdoj.gov

Philip V. Martino philip.martino@quarles.com; pmartino@ecf.epiqsystems.com;
jenny.fik@quarles.com; colleen.greer@quarles.com; wemet@quarles.com

Michael A. Pellegrino m.pellegrino3@gmail.com

Parties Served Via First Class Mail

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Michael A. Pellegrino
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#209
Streamwood, IL 60107
(First Class Mail and Certified Mail, Return Receipt Requested)